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ALEJANDRO REYES-RAMIREZ
7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 ALEJANDRO REYES-RAMIREZ,
15 Defendant.
16

3:14-cr-0065-RCJ-WGC

STIPULATION FOR RELEASE OF
PASSPORT FOR ONE DAY ONLY,
JULY 1, 2015

(First Request)

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
19 United States Attorney, and James Keller, Assistant United States Attorney, counsel for the United
20 States of America, and Rene L. Valladares, Federal Public Defender, and Lauren Gorman, Assistant
21 Federal Public Defender, counsel for ALEJANDRO REYES-RAMIREZ, that Mr. Reyes' passport
22 be released to him for one day only, July 1, 2015. We respectfully request permission to file Exhibit
23 A under seal as it contains Mr. Reyes' address.

24 This Stipulation is entered into for the following reasons:

25 Pretrial Services Officer Jennifer Simone has advised counsel for the government and
26 the defense that Mr. Reyes has an appointment on July 1, 2015 with United States Citizenship and
27 Immigration Services (USCIS) in Reno, Nevada to have his biometrics taken. (Exhibit A; under seal)

28 Mr. Reyes is required to bring a form of identification to the appointment.

1 The only form of identification Mr. Reyes has is a Mexican passport currently in the
2 custody of Pretrial Services.

3 Counsel for the government and the defense stipulate and agree that Pretrial Services
4 may release the passport at issue for one day only, July 1, 2015, so that Mr. Reyes may present his
5 identification to USCIS.

6 Pretrial Services does not oppose this request.

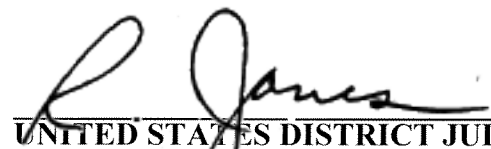
7 DATED: June 23, 2015.

8
9 By: /s/ Lauren Gorman
10 LAUREN GORMAN,
11 Assistant Federal Public Defender
12 Counsel for Alejandro Reyes-Ramirez

By: /s/ James Keller
JAMES KELLER
Assistant United States Attorney
Counsel for Plaintiff

13 By: Alejandro Reyes Ramirez
14 ALEJANDRO REYES-RAMIREZ

15
16 IT IS SO ORDERED:

17 
18 UNITED STATES DISTRICT JUDGE

19
20 DATED: ___ June 25, 2015 ___
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EXHIBIT A